

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AMY FAZENBAKER, *et al.*,

Plaintiffs,

v.

COMMUNITY HEALTH CARE, INC.,
d/b/a/ COMPLETECARE HEALTH
NETWORK,

Defendant.

Hon. Edward S. Kiel, U.S.D.J.

Hon. Sharon A. King, U.S.M.J.

Civil Action No. 1:24-11170

**PLAINTIFFS' NOTICE OF JOINDER IN THE REPLY BRIEF OF
NON-PARTY THE UNITED STATES OF AMERICA IN SUPPORT OF
PLAINTIFF'S MOTION TO REMAND THIS CIVIL ACTION**

**KANTROWITZ GOLDHAMER &
GRAIFMAN, P.C.**

135 Chestnut Ridge Road, Suite 200
Montvale, New Jersey 07645

MASON LLP

5335 Wisconsin Avenue, NW,
Suite 640
Washington, DC 20015

ISRAEL DAVID LLC

17 State Street, Suite 4010
New York, New York 10004

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN, PLLC
227 w. Monroe Street, Suite 2100
Chicago, IL 60606

[Additional Plaintiffs' Counsel Listed on Signature Page]

Plaintiffs Amy Fazenbaker, D.F., a minor by his legal guardian Amy Fazenbaker, Al-Tamia Webb, Mary Ann Dos Santos, Melissa Lyston, J.S., a minor by her guardian ad litem Tara Bixler, Marlon Pollard, Chad Santiago, Lacy Matczak, and Troy Durkee, hereby provide notice of their joinder in the Reply Brief filed by non-party the United States of America in support of its motion to remand, which Plaintiffs adopt in their entirety in support of Plaintiffs' Motion to Remand (Doc. 10). For the reasons set forth in Plaintiff's opening brief in support of their Motion to Remand and in the United States' reply brief, Defendant's removal was improper and untimely.

Accordingly, Plaintiffs request that the Court remand this civil action back to the New Jersey Superior Court.

Dated: March 4, 2025

Respectfully submitted,

**KANTROWITZ, GOLDHAMER &
GRAIFMAN, P.C.**

By: 

Gary S. Graifman

135 Chestnut Ridge Road, Suite 200

Montvale, New Jersey 07645

Tel: (201) 391-7000

Email: ggraifman@kgglaw.com

Gary E. Mason*

MASON LLP

5335 Wisconsin Avenue, NW, Suite 640

Washington, DC 20015

Tel: (202) 429-2290

Email: gmason@masonllp.com

Israel David*

ISRAEL DAVID LLC

17 State Street, Suite 4010
New York, New York 10004
Email: israel.david@davidllc.com
Tel: (212) 739-0622
Fax: (212) 739-0628

Gary M. Klinger*

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

227 W. Monroe Street, Suite 2100
Chicago, IL 60606
Tel: 866.252.0878
Email: gklinger@milberg.com

Interim Co-Lead Class Counsel

Daniel Srourian*

SROURIAN LAW FIRM, P.C.

3435 Wilshire Blvd. Suite 1710
Los Angeles, California 90010
Tel: (213) 474-3800
Fax: (213) 471-4160
Email: daniel@slfla.com

Amber L. Schubert*

**SCHUBERT JONCKHEER &
KOLBE LLP**

2001 Union St., Suite 200
San Francisco, California 94123
Tel: (415) 788-4220
Fax: (415) 788-0161
Email: aschubert@sjk.law

Jennifer S. Czeisler*

STERLINGTON PLLC

One World Trade Center, 85th Floor
New York, New York 10007

Tel: (212) 433-2993
Email: jen.czeisler@sterlingtonlaw.com

Ken Grunfeld
KOPELOWITZ OSTROW P.A.
75 Overhill Road
Bala Cynwyd, PA
Tel.: (215)-888-3214
Email: grunfeld@kolawyers.com

Executive Committee Members

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing upon all parties through their counsel of record by filing it with the Court's electronic-filing system in accordance with Fed. R. Civ. P. 5(b)(2)(E).



Gary S. Graifman